

United States District Court

SOUTHERN

DISTRICT OF
McALLEN DIVISION

TEXAS

UNITED STATES OF AMERICA

V.

Rosalinda Martinez-Molina
A087 591 920 YOB: 1974

PRINCIPAL

United States District Court
Southern District of Texas
Mexico FILED

MAR - 5 2015

Case Number:

M-15-0334-M

(Name and Address of Defendant)

Clerk of Court

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about March 3, 2015 in Hidalgo County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Francisco Javier Membrano-Soriano, and Ever Atilio Quintanilla-Criollo, citizens and nationals of El Salvador, along with seventeen (17) other undocumented aliens, for a total of nineteen (19), who had come to, entered, or remained in the United States in violation of law, concealed, harbored or shielded from detection, or attempted to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii) FELONY
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On March 3, 2015, JTT Border Patrol Agents Fidel Elizondo and Hector Garcia were conducting surveillance at a house in Mission, Texas, which had been previously associated with Rosalinda MARTINEZ-Molina. Agents had developed information that MARTINEZ was actively participating in alien smuggling.

At approximately 12:30 p.m., a gold Ford Grand Marquis was observed leaving that residence in Mission, Texas. The vehicle was occupied by one female, later identified as MARTINEZ's daughter. Agents followed the Grand Marquis to 5917 Minnesota Road, in Mission, Texas.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Signature of Complainant

Israel Perez Senior Patrol Agent

Printed Name of Complainant

at McAllen, Texas
City and State

Signature of Judicial Officer

Sworn to before me and subscribed in my presence,

March 5, 2015

Date

Dorina Ramos, U. S. Magistrate Judge
Name and Title of Judicial OfficerApproved to file Kimberly Ann Leo
AUSA

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-15-0334-M

RE: Rosalinda Martinez-Molina

A087 591 920

CONTINUATION:

At approximately 2:30 p.m., the Grand Marquis, occupied by two females, departed 5917 Minnesota Road and traveled to a Dollar General Store. There, the two females, later identified as Rosalinda MARTINEZ-Molina and MARTINEZ's daughter, purchased several gallons of water. After departing the Dollar General Store, Hidalgo County Constable Brown (PCT 4) conducted a vehicle stop for two violations; 1. Failure to signal a turn within the required distance. 2. Illegal wide turn. Constable Brown issued a warning for the Illegal Wide Turn.

At the vehicle stop, agents Elizondo and Garcia questioned the two females as to their citizenship. Both stated they were illegally present in the United States. Agents read MARTINEZ her rights, and she was questioned regarding 5917 Minnesota Rd. She stated she lived at that address and was harboring approximately 10 undocumented aliens there as well. MARTINEZ provided written consent to enter the residence, and she told agents the back door was open.

Agents returned to 5917 Minnesota Drive, and apprehended 19 undocumented aliens inside the house. Both MARTINEZ, MARTINEZ's daughter, and the 19 undocumented aliens were transported to the McAllen Border Patrol Station for processing.

NOTE: MARTINEZ's daughter was not prosecuted due to a lack of information implicating her in smuggling activities.

PRINCIPAL'S STATEMENT:

Rosalinda MARTINEZ-Molina was read her rights at the vehicle stop. She stated she was willing to provide a statement without the presence of an attorney.

MARTINEZ told agents she illegally crossed the Rio Grande River approximately seven years ago. MARTINEZ stated that prior to being pulled over by the police, she fed the illegal aliens inside her house, and she and her daughter then cleaned the house together.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-15-0334-M

RE: Rosalinda Martinez-Molina

A087 591 920

CONTINUATION:

At the vehicle stop, MARTINEZ admitted she told agents that she lived on La Homa Rd. because she was afraid to tell the truth due to having illegal aliens inside her house. Additionally, MARTINEZ told agents that there were 7 other illegal aliens that had already left her residence on February 26, 2015, for a total of 26 illegal aliens. A man she knows as Chango sends her the illegal aliens to take care of until they are ready to go north. He pays her \$100 per alien she harbors. MARTINEZ stated she was the only one in charge of the illegal aliens, and her daughter was not involved.

MATERIAL WITNESSES' STATEMENTS:

Both material witnesses were read their rights. Both were willing to provide a statement without the presence of an attorney.

1- Francisco Javier Membreno-Soriano, a citizen of El Salvador, claims to have been charged \$6,000 (USD) to be smuggled to Maryland. After illegally crossing the Rio Grande River, Membreno claims to have been transported to two different stash houses. At the second house, where he was arrested, one woman fed him twice per day. Membreno stated she was in charge of the house and identified MARTINEZ in a photo lineup as the woman in charge.

2- Ever Atilio Quintanilla-Criollo, a citizen of El Salvador, admitted to have illegally crossed the Rio Grande River. After crossing the river, Quintanilla walked in the brush and was picked up by a truck. He, and the group he was with, were transported to the house where he was arrested. When the truck arrived at the house, Quintanilla stood up to see where he was at. At that point, the woman who was driving the truck, asked him, "Who told you to get up?". She then told the group of illegal aliens to enter the house quickly and go straight into the bedroom. The woman driving the truck was the same woman who was later in charge of the house. According to Quintanilla, the woman in charge did not allow the group to turn on the lights, exit the bedroom, or keep their shoes on. The woman also fed the group twice per day. Quintanilla identified MARTINEZ in a photo lineup as the woman who drove the truck and the woman in charge of the house.